

April 22, 2005

WILLIAM SCHUMACHER
COWLITZ COUNTY REPUBLICAN CENTRAL COMMITTEE
120 VIEWCREST DRIVE
CASTLE ROCK WA 98611

Subject: Complaint filed against Paul Waadevig – PDC Case # 05-072

Dear Mr. Schumacher:

The Public Disclosure Commission (PDC) staff has completed its investigation of your complaint received August 30, 2004 alleging that the 2004 Paul Waadevig Campaign used contributions received by Mr. Waadevig's 2002 campaign for State Representative in the 19th Legislative District to seek election to the State Senate in the 17th Legislative District in the 2004 election, without receiving permission from the contributors of the funds to use their contributions to seek a different office.

PDC staff reviewed your complaint in light of the following statute:

RCW 42.17.790 requires candidates to receive written affirmative permission from campaign contributors before transferring contributions to a campaign for a different office than the office for which the contributions were received.

You alleged that the 2004 Paul Waadevig campaign used campaign signs originally purchased for Mr. Waadevig's 2002 race for State Representative in the 19th Legislative District to seek election to the State Senate in the 17th Legislative District in the 2004 election. You alleged that use of these signs constituted use of contributions made to his 2002 campaign to seek a different office without receiving the written permission of the contributors.

We found:

- Paul Waadevig made \$2,840 in monetary and in-kind loans to his 2002 campaign for State Representative. At the end of the campaign, he was still owed \$2,354 for unpaid candidate loans. Mr. Waadevig took possession of the used signs as his personal property after the 2002 campaign. He estimated the value of the signs to be \$400 after accounting for damage and destruction. Mr. Waadevig

stated that he considered the used signs a partial in-kind repayment of the loans he made to his 2002 campaign.

- Because Mr. Waadevig considered the used signs to be his personal property, he did not seek permission from any of the 2002 campaign contributors to use the signs in his 2004 Senate campaign.

Because Mr. Waadevig was not repaid for all of the loans he made to his 2002 campaign, and he did not forgive the loans, the transfer of surplus property to his 2004 campaign may be treated as a partial repayment of the outstanding loans. Thus, he was not required to obtain written permission from his 2002 contributors to use the signs in his 2004 campaign.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation and, with the concurrence of the Chair of the Public Disclosure Commission, I am dismissing your complaint against the 2004 Paul Waadevig campaign.

If you have questions, please feel free to contact Phil Stutzman, Director of Compliance, at (360) 664-8853.

Sincerely,

Vicki Rippie
Executive Director

c: Paul Waadevig